

EXHIBIT T

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of
SHANE BARKER
November 28, 2018
9:03 a.m.

Taken at:
Sheraton Suites Akron
1989 Front Street - Summit Room
Cuyahoga Falls, Ohio

Stephen J. DeBacco, RPR

1 Jones Day on behalf of Walmart.

2 MR. LONERGAN: Sam Lonergan with
3 Arnold & Porter Kaye Scholer on behalf of Endo
4 and Par.

5 MR. SQUIRE: Russell Squire from
6 Covington & Burling on behalf of McKesson.

7 MS. WU: Laura Flahive Wu, also of
8 Covington, on behalf of McKesson.

9 THE VIDEOGRAPHER: Will counsel on
10 the phone please state appearances for the
11 record.

12 MS. BECKER: Lily Becker of Morgan
13 Lewis on behalf of the Teva defendants.

14 THE VIDEOGRAPHER: Will the court
15 reporter please swear in the witness.

16 SHANE BARKER, of lawful age, called for
17 examination as provided by the Federal Rules of
18 Civil Procedure, being by me first duly sworn,
19 as hereinafter certified, deposed and said as
20 follows:

21 EXAMINATION OF SHANE BARKER

22 BY MS. WU:

23 Q. Good morning, Captain Barker.

24 A. Good morning.

25 Q. Could you please state your full

1 A. I was doing all three of those
2 things I just mentioned. I didn't get hired as
3 a deputy for almost a year.

4 Q. Who hired you as a deputy?

5 A. Sheriff Troutman, Summit County
6 Sheriff's Office.

7 Q. And what was your title at the time
8 you were hired?

9 A. Deputy sheriff.

10 Q. What was the nature of your
11 responsibilities in that role?

12 A. When I first got hired in the
13 sheriff's office, I worked in the corrections
14 division for a couple years, and then I got
15 transferred to patrol as a deputy, until I was
16 promoted to sergeant in 1999.

17 Q. What were the approximate dates of
18 your tenure as a deputy in the corrections
19 division?

20 A. It would have been from 1994 until
21 about 1997, so just a little over three years,
22 as I recall.

23 Q. What were your responsibilities in
24 the corrections division during the period 1994
25 to 1997?

1 Q. When did the sheriff's department
2 first become concerned about fentanyl in the
3 Summit area?

4 MR. LEDLIE: Object to the form of
5 the question. He's a fact witness. He's not a
6 30(b)(6) for the sheriff's department.

7 Q. You can still --

8 A. Still answer?

9 Q. Yes, please.

10 A. So I know specifically when I
11 became aware of it. As -- as a captain, I was
12 assigned to the corrections bureau, and we got
13 a letter in, and it had a patch that people get
14 and they put on their -- for medical treatment.
15 And it was being sent in through the mail for
16 the inmates to get. And one of our inmate
17 service workers who screens the mail found it.

18 So that was probably very early
19 2011, 2012. I start -- I personally had
20 knowledge that we were worried about it getting
21 in -- into the jail.

22 Q. So you're describing your own
23 personal experience encountering fentanyl in
24 about 2011. What was the nature of your
25 employment for the sheriff's department at that

1 BY MS. MORRISON:

2 Q. Good afternoon, Captain Barker. My
3 name is Kristin Morrison. I represent Walmart.

4 Are you aware that Summit County
5 has sued my climate -- my client, Walmart, in
6 this case?

7 A. I am aware, yes.

8 Q. And what is the source of your
9 knowledge about my client, Walmart, being sued
10 in this case?

11 A. They were being sued because there
12 was a large amount of prescriptions that were
13 being filled, and it was -- it was a large
14 increase from the years before, and nobody said
15 anything about it.

16 Q. Can you personally point to any
17 specific conduct by Walmart related to opioids
18 that caused any harm to Summit County?

19 A. No, I cannot.

20 Q. Okay. Are you aware that Summit
21 County also has sued Walgreens in this lawsuit?

22 A. Yes.

23 Q. And what is the basis of your
24 knowledge about the suit against Walgreens?

25 MR. LEDLIE: You can answer the